

From: [Kolosseus, Andrew \(ECY\)](#)
To: [Zell, Christopher](#); [Mann, Laurie](#)
Subject: WLA for nutrients
Date: Wednesday, August 24, 2016 5:17:15 PM

Chris and Laurie:

I was just going back through our notes on our responses to previous EPA comments on the TMDL. While not explicitly stated in the TMDL (as far as I can tell), one of our reasons for not including numeric WLA for nutrients in the general permits was that all of our general permits are downstream Offutt Lake. The area downstream of Offutt Lake (with its less stringent DO criteria) can easily meet standards with just temperature improvements (see page 69-70 for this part of the discussion).

To the extent that we need nutrient reductions, it is above Offutt Lake where we don't have permittees.

Does this help at all with the numeric WLA issue? I realize that it doesn't address other issues, but perhaps it helps with one.

Andrew